

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

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OREGON FIREARMS FEDERATION,	)	
INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	Case Nos.
v.	)	2:22-cv-01815-IM
	)	3:22-cv-01859-IM
KATE BROWN, et al.,	)	3:22-cv-01862-IM
	)	3:22-CV-01869-IM
Defendants.	)	
	)	
	)	
	)	
(Continued)	)	

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\* VIDEOCONFERENCE \*  
VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION  
OF EXPERT  
CLAYTON CRAMER

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Witness located in:

Middleton, Idaho

\* All participants appeared via videoconference \*

DATE TAKEN: January 19, 2023

REPORTED BY: Tia B. Reidt, Washington RPR, CSR #2798  
Oregon #22-0001

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Ex. 6 - Dodd Decl.

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(Continued) )  
)  
MARK FITZ, et al., )  
)  
Plaintiffs, )  
v. )  
)  
ELLEN F. ROSENBLUM, et al., )  
)  
Defendants. )  
)  

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KATERINA B. EYRE, et al., )  
)  
Plaintiffs, )  
v. )  
)  
ELLEN F. ROSENBLUM, et al., )  
)  
Defendants. )  
)  

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DANIEL AZZOPARDI, et al., )  
)  
Plaintiffs, )  
v. )  
)  
ELLEN F. ROSENBLUM, et al., )  
)  
Defendants. )  

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APPEARANCES

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\* \* \* \* \*

1           Let's go ahead and take -- how long do you  
2 think you'd like just to not feel pressured and be able  
3 to run those numbers?

4           THE WITNESS: I'd say about ten minutes.

5           MS. DAWSON: Okay.

6           Let's go ahead and take a quick ten-minute  
7 break, then.

8           THE VIDEOGRAPHER: Going off the record.

9           The time is 11:15 a.m.

10          (Pause in the proceedings.)

11          THE VIDEOGRAPHER: We are back on the  
12 record.

13          The time is 11:19 a.m.

14 BY MS. DAWSON:

15          Q. Mr. Cramer, during our break, did you have the  
16 opportunity to calculate a total number for that chart  
17 on page 20?

18          A. Yes. And you're right. It is -- it is -- I'm  
19 not sure exactly which query produced that data, but  
20 it's clearly wrong. I can tell you how many incidents  
21 and dead there were by firearms before 1960 and how  
22 many by non-firearm before 1960.

23          Q. And can you explain to me when you say that  
24 it's clearly wrong?

25          A. Well, the query that I constructed to request

1 although the general theme that a non-firearm  
2 [indecipherable] is actually quite common in American  
3 history --

4 (Reporter clarification.)

5 THE WITNESS: That non-firearm mass  
6 murders are actually quite common in American history,  
7 they've become more common -- firearm mass murders have  
8 become more common in the last century or so. But  
9 there's all sorts of horrible ways that people have  
10 committed mass murder in American history without guns.

11 BY MR. PEKELIS:

12 Q. Understood.

13 Would you want the court to rely on the data  
14 in your declaration, Exhibit 11?

15 A. Well, I can understand why they might be  
16 reluctant to accept the data exactly as -- as it is  
17 presented. Although, some of the larger themes that  
18 I'm presenting, the problem with the fact that mental  
19 illness is a major factor in what causes these mass  
20 murders is, I think, still a valid point.

21 Q. Understood.

22 You mentioned when discussing your educational  
23 backgrounds that you have a master's degree and a  
24 bachelor's degree; is that right?

25 A. Correct.

1 this information for the database was clearly not  
2 properly constructed. I will say that I -- SQL  
3 database queries can be sometimes rather confusing.  
4 And I will not say that I'm quite as expert perhaps as  
5 I need to be, but I at least have numbers that make  
6 some sense now.

7 Q. So we have the -- we have the chart here,  
8 which it sounds like you agree is likely incorrect. We  
9 have the numbers on page 21. And just so that I am  
10 clear, what do those numbers represent in the first  
11 paragraph on page 21 where it says "When grouped by  
12 incidents..."?

13 A. Incidents where only a non-firearm item was  
14 marked. Because I've added a few entries in the  
15 last -- in the last few days, incidents before 1960,  
16 the non-firearms incidents are now 3,812 dead, a total  
17 of 807 incidents. And the incidents by firearm are now  
18 866 incidents, 3,740 dead. It definitely changes  
19 things a bit.

20 Q. Okay.

21 And so if you flip to -- I'll take you to --  
22 let me take a look at my page number. For my own  
23 information, when we're looking at your non-firearm  
24 data, were there any instances or incidents in that  
25 dataset where more than 50 people were killed?

1 numbers. So...

2 A. Okay.

3 All this information is stored in a database  
4 under Microsoft Access. A database is a fairly complex  
5 set of relationships where you can -- you can produce  
6 what are called queries where you say, Show me how many  
7 incidents took place during this period of time. Show  
8 me how many incidents took place with this set of  
9 information associated with them. How many of these  
10 incidents had a pistol involved? How many of these  
11 were family incidents? How many of these were  
12 robberies or rapes?

13 And the art of writing SQL queries is a little  
14 more complicated than it first looks. And while I've  
15 taken classes in SQL in the past, I certainly have not  
16 always -- I'm not necessarily always up to completely  
17 doing a perfect job on these queries. And I will  
18 definitely be going back as a result of all of this and  
19 be checking some of this data and verifying that I'm  
20 actually getting correct results.

21 Q. Okay.

22 And how long approximately would it take you  
23 to redo that work and double-check them?

24 A. Probably -- probably Monday or Tuesday at the  
25 earliest. I have to lure one of my friends in who is

1 an SQL expert to assist me to verify that -- the  
2 accuracy of the results.

3 Q. And that might result in changes in some of  
4 the conclusions you'd made in some of the other  
5 paragraphs; is that correct?

6 A. It would certainly result in changes in the --  
7 in some of the data presented, and I suspect -- I'd be  
8 surprised if it dramatically changed the conclusions  
9 because the core issue is that mental illness appears  
10 repeatedly in these mass murder incidents. And  
11 throughout the 19th century there was a very dramatic  
12 increase in mass murder instances involving mental  
13 illness, starting in the 1860 decade through 1909,  
14 which I suspect may be related to PTSD by Civil War  
15 soldiers.

16 I was surprised to find that 40 percent of the  
17 US population, not 40 percent of the men, but 40  
18 percent of the whole US population served during the  
19 Civil War.

20 Q. Do you think it would be a benefit for the  
21 court if it were to hear your evidence to have the  
22 chart on page 20 corrected and for you to correct your  
23 declaration?

24 A. I believe it probably would, yes. It would  
25 certainly make me feel less stupid.

C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Tia Reidt, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of CLAYTON CRAMER, having been duly sworn, on January 19, 2023, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 26th day of January, 2023.

A handwritten signature in black ink, reading "Tia B. Reidt", is written over a horizontal line.



/S/ Tia B. Reidt  
Tia B. Reidt, RPR, CSR Oregon #22-0001  
NOTARY PUBLIC, State of  
Washington.  
My commission expires  
5/15/2026.